

## **U.S. Department of Justice**

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### **NEWS RELEASE:**

#### **61 Defendants Charged in Fraud Schemes Involving Tens of Thousands of Stolen Personal Identities**

Wifredo A. Ferrer, United States Attorney for the Southern District of Florida, Kelly R. Jackson, Special Agent in Charge, Internal Revenue Service, Criminal Investigation (IRS-CI), Miami Field Office, Timothy Camus, Deputy Inspector General for Investigations, Treasury Inspector General for Tax Administration (TIGTA), Margaret Moore-Jackson, Special Agent in Charge, Social Security Administration, Office of Inspector General (SSA-OIG), Robert C. Hutchinson, Acting Special Agent in Charge, U.S. Immigration and Customs Enforcements Homeland Security Investigations (ICE-HSI), Miami Field Office, George L. Piro, Special Agent in Charge, Federal Bureau of Investigation (FBI), Miami Field Office, J.D. Patterson, Director, Miami Dade Police Department (MDPD), Brian Swain, Special Agent in Charge, U.S. Secret Service (USSS), Miami Field Office, Ronald J. Verrochio, Inspector in Charge, U.S. Postal Inspection Service (USPIS), Miami Division, Rafiq Ahmad, Special Agent in Charge, United States Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations Miami Office (DOL-OIG), Carlos Canino, Special Agent in Charge, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), Amos Rojas, Jr., United States Marshal, U.S. Marshals Service (USMS), Jesse Panuccio, Executive Director, Florida Department of Economic Opportunity (DEO), Steve Steinberg, Chief, Aventura Police Department, J. Scott Dennis, Chief, North Miami Beach Police Department (NMBPD), Scott Israel, Sheriff, Broward Sheriff's Office (BSO), Tony Pustizzi, Chief, Coral Springs Police Department (CSPD), Edward J. Hudak, Jr., Chief, Coral Gables Police Department, Rudy Herbello, Assistant Chief, Golden Beach Police Department, Ray Black, Chief, Miramar Police Department, W. Howard Harrison, Chief, Plantation Police Department, Franklin Adderley, Chief, Fort Lauderdale Police Department, Rodolfo Llanes, Chief, Miami Police Department (MPD), and Dan Guistino, Chief, Pembroke Pines Police Department, announce the filing of federal charges against 61 defendants in 43 separate cases, dealing with tens of thousands of stolen identities and millions of dollars stolen from individuals, businesses and government agencies through fraudulent schemes. Today's cases reaffirm the joint federal, state and local commitment to the prosecution of perpetrators who steal, sell and use personal identification information to commit identity theft fraud schemes.

In an attempt to combat the rising wave of stolen identity tax refund scams, and armed with recent directives from the Department of Justice's Tax Division, making prosecutions faster and easier, the U.S. Attorney's Office for the Southern District of Florida established the South Florida Identity Theft Tax Fraud Strike Force (Strike Force) in August 2012. With the escalating spread of fraud offenses, the Strike Force has broadened the scope of its focus and is now identified as the Identity Theft Fraud Strike Force.

The cases announced in this takedown demonstrate the pernicious and prevalent nature of identity theft fraud. This fraud permeates every aspect of the public sphere and private industry. The expanded scope of the Identity Theft Fraud Strike Force recognizes the breadth of this problem and demonstrates law enforcement's ability to tackle the ever evolving identity theft threat. No longer limited to stolen identity tax refund fraud or any type of government benefit fraud, the Strike Force is investigating and prosecuting cases including an intrusion into proprietary government databases, takeovers by identity thieves of accounts as diverse as U.S. Social Security accounts, retail credit card accounts, and bank accounts, and the use of skimmers to steal valuable personal identity information. These cases demonstrate that law enforcement in general and the Strike Force in particular continue to adapt to meet this insidious identity theft threat.

Since the inception of the Strike Force, we have charged 433 defendants, who were responsible for approximately \$352 million in intended losses and in excess of \$142 million in actual SIRF fraud loss.

The members of the Strike Force, and participating agencies, include the United States Attorney's Office, IRS-CI, TIGTA, SSA-OIG, ICE-HSI, FBI, MDPD, USSS, USPIS, DOL-OIG, ATF, USMS, DEO, Aventura Police Department, NMBPD, BSO, CSPD, Coral Gables Police Department, Golden Beach Police Department, Miramar Police Department, Plantation Police Department, Fort Lauderdale Police Department, MPD, and Pembroke Pines Police Department.

United States Attorney Wifredo A. Ferrer stated, "Identity theft continues to plague our community in evolving ways. Identity thieves are now using stolen personal identity information to infiltrate proprietary government databases and accounts of private individuals at banks, retailers and other financial institutions. We remain committed to stopping identity thieves who cost individuals and entities across the public and private sectors billions of dollars. The cost of identity theft cannot be measured in dollars alone, as it further undermines the financial stability of identity theft victims and wreaks havoc on their lives. Our Office thanks the dedicated members of federal, state and local law enforcement who work tirelessly to bring these offenders to justice."

Kelly R. Jackson, Special Agent in Charge, IRS Criminal Investigation (IRS-CI), stated, "As a result of today's coordinated effort, we have charged and arrested individuals who participated in different roles related to stolen identity refund fraud (SIRF) and numerous other identity theft schemes. IRS-CI remains committed to allocating time and resources to investigating those who victimize individuals for their

own personal gain. The investigation of egregious return preparers and SIRF cases remain a top priority for IRS-CI.”

“We estimate that criminals steal billions of dollars of IRS tax refunds each year by utilizing various schemes involving stolen identities. This crime victimizes not only the person whose identity has been stolen, but every American taxpayer. Prosecuting individuals for stealing identity information and refunds will continue to be one of our top investigative priorities,” said TIGTA Deputy Inspector General for Investigations Timothy Camus.

“Social Security payments are a lifeline for many Americans who are retired or unable to work due to disability. These indictments are a testament to our serious commitment to pursuing those who would victimize Social Security beneficiaries. Our office is gratified by the U.S. Attorney’s shared commitment to investigate and prosecute this type of fraud, which affects all Americans,” Special Agent in Charge Margaret Moore-Jackson, Social Security Administration, Office of the Inspector General.

“Ranging from tax fraud to immigration fraud violations, ICE-HSI strives to disrupt identity theft on many levels to protect our citizens and financial infrastructure,” said Robert C. Hutchinson, Acting Special Agent in Charge of HSI Miami. “We will continue to utilize our very broad authorities and vast skills to support this important mission with our partner agencies.”

Juan J. Perez, Acting Director, Miami-Dade Police Department, announced that “The investigations and arrests highlighted today are yet another example of how much can be accomplished through strong relationships and collaboration between law enforcement agencies at all levels. The Miami-Dade Police Department remains committed to this spirit of teamwork and to using all tools available in combating the crimes of fraud and identity theft which affect the entire community.”

“The U.S. Mail remains one of the most secure means of transmitting personal information,” said Ronald Verrochio, Inspector in Charge, USPIS, Miami Division. “The Postal Inspection Service is committed to ensuring the nation’s mail system is not exploited by criminals for illicit financial gain.”

“An important part of the DOL-OIG mission is to investigate unemployment insurance fraud, often perpetrated through identity theft. We are committed to continuing to work with our Identity Theft Strike Force partners and the law enforcement agencies in other affected states in an effort to combat this issue,” stated Rafiq Ahmad, Special Agent in Charge of the Atlanta Regional Office of the United States Department of Labor, Office of Inspector General, Office of Labor Racketeering and Fraud Investigations.

Florida Department of Economic Opportunity Executive Director Jesse Panuccio said, “Identity theft and related fraud have reached crisis levels, and the Department of Economic Opportunity has made fighting this fraud a top priority. Over the last two

years, we have stopped 135,000 fraudulent claims with a potential value of \$558 million. The criminals who attempt this fraud need to understand that they will be caught, arrested, and prosecuted. We are thankful for our partnership with, and the hard work of, the U.S. Department of Labor's Office of Inspector General and the U.S. Attorney for the Southern District of Florida."

Today, U.S. Attorney Ferrer, joined by members of the Identity Theft Fraud Strike Force, announce the most recent results of their investigative efforts. The cases announced today include:

#### A. STOLEN DATA

##### 1. United States v. Marvin Ricardo Herard, Case No. 15-20898-CR-Gayles

On November 17, 2015, **Marvin Ricardo Herard**, 26, of Miami, was charged in a thirteen-count indictment for his participation in an identity theft tax fraud scheme.

According to the allegations contained in the indictment, between October 2011 and July 2015, Herard was involved in a stolen identity refund scheme that used stolen personal identification information to file false federal income tax returns. Herard and his co-conspirators also used stolen personal identification information to access the Internal Revenue Service's "Get Transcript" service and obtain tax records of their identity theft victims. Herard and his co-conspirators caused the IRS to deposit the fraudulent tax returns onto prepaid debit cards and bank accounts controlled by them, and Herard used a debit card number registered to another person.

Herard was charged with conspiracy to commit wire fraud, wire fraud, aggravated identity theft, possession of fifteen or more unauthorized access devices, and use of unauthorized access devices.

Mr. Ferrer commended the investigative efforts of IRS-CI, TIGTA and NMBPD. The case is being prosecuted by Assistant U.S. Attorney Daya Nathan.

##### 2. United States v. Arvis Jamar Lawson, Case No. 15-06494-MJ-Valle

On November 17, 2015, **Arvis Jamar Lawson**, 30, of Broward County, was charged by complaint for his participation in an access device fraud scheme.

According to the allegations contained in the complaint, Lawson possessed and exchanged with co-conspirators numerous individuals' personal identification information, including names, dates of birth and Social Security numbers. Lawson also possessed personal identification information for an individual who had been the victim of a fraudulent tax return filing.

Mr. Ferrer commended the investigative efforts of TIGTA, IRS-CI, NMBPD and Fort Lauderdale Police Department. The case is being prosecuted by Assistant U.S. Attorney Daya Nathan.

## **B. ACCOUNT TAKEOVERS**

### **3. United States v. Judel Jean-Charles, Case No. 15-6490-MJ-Valle**

On November 16, 2015, **Judel Jean-Charles**, 24, of Miami, was charged by criminal complaint with using an unauthorized access device to obtain a thing of value aggregating \$1,000 or more and aggravated identity theft.

According to the allegations contained in the criminal complaint, on or about July 18, 2015, an anonymous person called the Miramar Police Department to report suspicious activity at an ATM located at a Wells Fargo branch located in Miramar, Florida. An officer from the Miramar Police Department responded to the scene and observed an individual, later identified as Jean-Charles, matching the description provided by the anonymous caller.

While the officer was speaking to Jean-Charles, the defendant dropped something on the ground at the rear of a vehicle. As a second police officer arrived, Jean-Charles fled the scene on foot leading the officers on a chase through the fenced in yards of several homes in the area before he was caught by the officers. A search of Jean-Charles recovered \$7,200 in cash from his pocket. The officers also recovered two Visa credit cards in other individuals' names, one from the defendant's flight path and the other from the vehicle. The defendant was arrested on state charges.

A subsequent investigation revealed that the two Visa credit cards in other individuals' names were issued by the same bank (the "Victim Bank"). Investigators made contact with the Victim Bank and learned that the Visa credit cards belonged to individuals living in the State of Ohio. Investigators further learned that both accounts had been compromised by unidentified individuals who called the Victim Bank and (i) ordered replacement cards to be sent to an address in Florida and (ii) changed the PIN numbers on the respective accounts. Further, it appears that the unidentified callers utilized masking software when they called the Victim Bank to make it appear that they were calling from the account holders' phone numbers on record with the Victim Bank in a process known as "spoofing." In total, the Victim Bank reported to law enforcement that on July 18, 2015, the two replacement cards recovered by the Miramar Police Department were used to make an ATM withdrawal in the amount of \$7,227 from the Wells Fargo branch in Miramar, Florida, and a \$6,424 ATM withdrawal from a Wells Fargo Branch in Pembroke Pines, Florida.

Mr. Ferrer commended the investigative efforts of Aventura Police Department, Miramar Police Department and IRS-CI. The case is being prosecuted by Assistant U.S. Attorney Brooke C. Watson.

4. **United States v. Jean Ductan**, Case No. 15-200861-CR-Ungaro

On November 5, 2015, **Jean Ductan**, 34, of Miami, was charged in a five-count indictment for his participation in a debit card fraud scheme.

According to the allegations contained in the indictment, from October 2014 to October 15, 2015, Ductan engaged in a conspiracy to use unauthorized debit cards to obtain something of value aggregating \$1,000 or more. Members of the conspiracy ordered replacement pins and debit cards for at least three victims' accounts and stole the replacement pins and debit cards from the mail at the victims' addresses. Ductan then used the debit cards to withdraw at least \$4,000 from the victims' accounts at ATMs in Miami-Dade and Broward Counties.

According to additional court documents, on October 15, 2015, law enforcement officers observed Ductan drive up to the mailbox of a residence in Plantation, Florida, sort through the mail, and drive away. During an investigatory stop of the vehicle, officers found two envelopes addressed to that same residence. The envelopes contained debit cards that had been taken without the knowledge and authority of the addressee.

The indictment charges Ductan with conspiracy to use unauthorized debit cards to obtain \$1,000 or more, use of unauthorized debit cards to obtain \$1,000 or more, aggravated identity theft, and theft of mail.

Mr. Ferrer commended the investigative efforts of the USPIS. The case is being prosecuted by Assistant U.S. Attorney Tonya R. Long.

5. **United States v. Nadia Coles, et al.**, Case No. 15-20827-CR-Gayles

On November 17, 2015, **Nadia Coles**, 36, **Deidra Steed**, 27, **Brittany Roby**, 28, **Kevin Bennet**, 37, **Zakeylia Ward**, 23, and **Eugene Rodriguez**, 21, all of Miami, were charged in a seventeen-count indictment for their participation in a conspiracy to use stolen personal identity information (PII) to take over unauthorized credit card accounts at department stores in South Florida.

According to the allegations contained in the indictment, at least as early as August 2015, the defendants and their co-conspirators would use the stolen PII to call and fraudulently add themselves as authorized users of the victims' credit card accounts. The defendants would then travel to the department stores and request to

purchase large amounts of merchandise using the victims' credit card accounts. The defendants and their co-conspirators would enter the true customers' stolen Social Security number into the keypad at the store counter or provide the customers' PII directly to the cashier in order to complete the purchases.

Mr. Ferrer commended the investigative efforts of the MDPD Economic Crimes Bureau/Organized Fraud Intelligence Squad (OFIS). The case is being prosecuted by Assistant U.S. Attorney Timothy J. Abraham.

6. **United States v. Frisler Clairvil**, Case No. 15-60295-CR-Dimitrouleas/Snow

On November 17, 2015, **Frisler Clairvil**, 29, of Lauderdale Lakes, was charged in an eight-count indictment for his participation in a conspiracy to use stolen personal identity information (PII) to commit Social Security fraud.

According to the allegations contained in the indictment, at least as early as June 2013, the defendant and his co-conspirators would use the stolen PII to obtain Social Security benefit payments that belonged to Social Security beneficiaries. To accomplish this scheme, Clairvil and his co-conspirators logged onto the Social Security Administration website, "My Social Security," with the victims' names, dates of birth, and Social Security numbers to open online accounts in those victims' identities. Once the online accounts were opened, Clairvil and his co-conspirators redirected the Social Security benefit payments from the victims to themselves by having the funds deposited into bank accounts which they controlled. To further conceal their criminal activity, Clairvil and his co-conspirators opened these bank accounts using stolen PII of other persons.

From June 2013 to October 2015, Clairvil and his co-conspirators used the stolen PII of over 1,300 victims and stole over \$300,000 in Social Security benefits.

Clairvil was charged with conspiracy to use unauthorized access devices, access device fraud, theft of government money, and aggravated identity theft.

Mr. Ferrer commended the investigative efforts of the SSA-OIG. The case is being prosecuted by Assistant U.S. Attorney Timothy J. Abraham.

7. **United States v. Alexander Bernard Harris**, Case No. 15-20850-CR-Middlebrooks

On October 30, 2015, **Alexander Bernard Harris**, 25, of Miami, was charged in a six-count indictment for the theft of Social Security benefits.

According to the allegations contained in the indictment, Harris re-directed the Social Security benefits of other individuals into bank accounts in his own name by stealing the personal identifying information of Social Security beneficiaries.

Mr. Ferrer commended the investigative efforts of the SSA-OIG. The case is being prosecuted by Assistant U.S. Attorney Matthew Langley.

8. **United States v. Hervens Steven Sanon**, Case No. 15-20849-CR-Gayles

On October 30, 2015, **Hervens Steven Sanon**, 29, of Miami, was charged in a five-count indictment for the theft of Social Security benefits.

According to the allegations contained in the indictment, Sannon stole the Social Security benefits of other individuals and deposited those benefits into his own account.

Mr. Ferrer commended the investigative efforts of the SSA-OIG. The case is being prosecuted by Assistant U.S. Attorney Matthew Langley.

9. **United States v. Samonique Honer**, Case No. 15-03497-MJ-Simonton

On November 18, 2015, **Samonique Honer**, 26, of Miami, was charged by criminal complaint for her participation in a stolen identity Social Security Administration (SSA) benefit and tax fraud scheme.

According to the allegations contained in the criminal complaint, from approximately February 2014, and continuing through at least October 2014, Honer conspired with others to knowingly and willfully receive for her own use and gain SSA benefit payments and United States Department of Treasury tax refund checks, knowing that the benefit payments and tax refunds had been stolen and converted. Honer and her co-conspirators obtained SSA benefits and tax information belonging to other individuals without their knowledge and authority. They subsequently unjustly enriched themselves by obtaining SSA benefit payments and United States Department of Treasury tax refunds, to which they were not entitled.

According to the complaint, on or about February 25, 2014, Honer incorporated Hooper Financial Accounting Services, LLC (Hooper Financial) a Florida corporation, with its principal place of business in Miami-Dade County. Honer was listed on corporate documents as the manager and registered agent of Hooper Financial. Bank records indicate that on or about February 28, 2014, Honer opened a Citibank, N.A. bank account in the name of Hooper Financial. One debit card, with a corresponding PIN, was issued in connection with the account. Honer was the only signatory on the bank account. Honer and her co-conspirators designated this bank account for the deposit of

the fraudulently obtained SSA payments and federal income tax refunds. Surveillance video captured conspirators withdrawing funds from this account for their own use and benefit.

The criminal complaint charges the defendant with conspiracy to commit an offense against the United States, and theft of government property.

Mr. Ferrer commended the investigative efforts of the SSA-OIG and IRS-CI. The case is being prosecuted by Assistant U.S. Attorney Anne P. McNamara.

10. **United States v. Emelia Chang and Ashley Palmieri**, Case No. 15-6492-MJ-Valle

On November 17, 2015, **Emelia Chang**, 25, of Miami, and **Ashley Palmieri**, 24, of Miami Gardens, were charged by criminal complaint for their participation in a debit card fraud scheme to order replacement debit cards and personal identification numbers (“pins”) to be sent to victims’ addresses; steal those debit cards and pins from the mail; and use them to withdraw funds from victims’ accounts without authorization.

According to the allegations contained in the criminal complaint, from October 2, 2014 to October 21, 2014, Chang and Palmieri engaged in a conspiracy to use unauthorized debit cards to obtain something of value aggregating \$1,000 or more. Members of the conspiracy ordered replacement pins and debit cards for at least two victims’ accounts and stole the replacement pins and debit cards from the mail at the victims’ addresses. Chang then used the debit cards to withdraw at least \$5,100 from the victims’ accounts at ATMs in Broward County. On October 21, 2014, law enforcement officers observed Palmieri drive up to a mailbox in Pembroke Pines, Florida, take the mail, and drive away. During an investigatory stop of the vehicle, officers found mail addressed to that same residence, including a letter that appeared to contain a debit card and one that appeared to contain a pin number. In a post-*Miranda* statement, Palmieri admitted to driving Chang to banks, where Chang made ATM withdrawals.

The complaint charges Chang and Palmieri with conspiracy to use unauthorized debit cards to obtain \$1,000 or more.

Mr. Ferrer commended the investigative efforts of USPIS. The case is being prosecuted by Assistant U.S. Attorney Tonya R. Long.

**C. SKIMMING CASES**

11. **United States v. Anthony Nunovero and Edelson Sanchez**, Case No. 15-20884-CR-Huck

On November 13, 2015, **Anthony Nunovero**, 29, and **Edelso Sanchez**, 53, both of Miami, were charged in an eight-count indictment for their participation in a conspiracy to illicitly install credit card skimmers at gas pumps in South Florida gas stations in order to steal the credit card account information of unsuspecting customers and then making and using counterfeit credit cards with the stolen information.

According to the allegations contained in the indictment, at least as early as August 2015, the defendants and their co-conspirators installed credit card scanning devices which were modified to attach to the credit card readers in area gas pumps so that the scanners would capture the credit card account information of unsuspecting customers. The defendants and their co-conspirators would open the targeted gas pumps, install the credit card scanning device, close the pump and replace the gas pump tamper-proof seal stickers with counterfeit tamper-proof stickers. They would later collect the skimmer and create counterfeit credit cards with the credit card account information that had been taken from unsuspecting customers.

Mr. Ferrer commended the investigative efforts of the MDPD Economic Crimes Bureau/Organized Fraud Intelligence Squad (OFIS). The case is being prosecuted by Assistant U.S. Attorney Matthew Langley.

12. **United States v. Randy Normul Pierre**, Case No. 15-20661-CR-Altonaga

**Randy Normul Pierre**, 29, of Miami, was charged in a six-count indictment for his participation in an identity theft scheme.

According to the allegations contained in the indictment, the defendant possessed device-making equipment, including State of Florida seal adhesives and card stock, as well as the Social Security numbers of fifteen or more persons. On September 23, 2015, Pierre pled guilty to identity theft and the unlawful possession of device-making equipment. Pierre is scheduled to be sentenced on November 30, 2015 before U.S. District Court Judge Cecilia M. Altonaga.

Mr. Ferrer commended the investigative efforts of IRS-CI and FBI. The case is being prosecuted by Assistant U.S. Attorney John R. Byrne.

13. **United States v. Marlin Jean**, Case No. 15-20870-CR-Moreno

On November 6, 2015, **Marlin Jean**, 24, of Miami, was charged in a three-count indictment for possessing 15 or more counterfeit credit cards and credit card account numbers, access device-making equipment, and a stolen firearm.

Mr. Ferrer commended the investigative efforts of the USSS and MPD. The case is being prosecuted by Assistant U.S. Attorney Matthew Langley.

14. **United States v. Rolando Aguilar Conde**, Case No. 15-20877-CR-Martinez

On January 30, 2015, **Rolando Aguilar Conde**, 29, of Miami, was charged in a two-count indictment with unauthorized possession of device-making equipment and aggravated identity theft.

According to the allegations contained in the indictment and other court records, on September 22, 2015, law enforcement executed a search warrant at Conde's residence pursuant to an investigation of identity theft and credit card fraud of other residents, including the defendant's mother. During the search, law enforcement officers discovered, among other things, a credit card "skimming" device and a credit card embossed with Conde's name and encoded with a debit account number issued to another person in Conde's bedroom. In addition, law enforcement discovered 28 other credit cards embossed with Conde's name and encoded with credit and debit card account numbers issued to other persons. The investigation also revealed that the "skimming" device contained a debit card account number that had been issued to another person.

Mr. Ferrer commended the investigative efforts of the ICE-HSI and the CSPD. The case is being prosecuted by Assistant U.S. Attorney Joshua S. Rothstein.

**D. MONEY SERVICE BUSINESSES**

15. **United States v. Junior Jean Baptiste**, Case No. 15-20777-CR-Martinez

On October 1, 2015, **Junior Jean Baptiste**, 35, of Miami, was charged in a twenty-count indictment for his participation in a stolen identity refund fraud scheme involving the cashing of fraudulently obtained tax refund checks.

According to the allegations contained in the indictment, Baptiste operated a check-cashing store called Surveillance Master LLC in North Miami, Florida from 2010 to 2012. At this store, the defendant cashed fraudulently obtained tax refund checks for a fifty-percent fee and knowingly possessed hundreds of false identification documents corresponding to tax refund checks. Hundreds of the tax refund checks had been issued in the names of deceased persons. In total, the defendant cashed over \$10 million in fraudulently obtained tax refund checks. Among other things, Baptiste used proceeds from this fraud scheme to purchase a cargo ship, registered in Palau.

The defendant was charged with possession of five or more false identification documents and aggravated identity theft.

Mr. Ferrer commended the investigative efforts of IRS-CI and ICE-HSI. This case is being prosecuted by Assistant U.S. Attorney Michael N. Berger.

16. **United States v. Gino Denis**, Case No. 15-03496-MJ-Simonton

**United States v. Sebastien Dumond**, Case No. 15-20839-CR-Moreno

On November 18, 2015, **Gino Denis**, 32, of Miami Lakes, was charged by criminal complaint for his participation in a stolen identity refund fraud scheme involving the cashing of fraudulently obtained tax refund checks. **Sebastien Dumond**, 25, of Miami, was previously charged in a one-count information for his role in this scheme.

According to the allegations contained in the criminal complaint, Denis operated Tiblanc Multi-Services in Miami, Florida in 2012 and 2013. At this store, Denis cashed approximately \$3.8 million in fraudulently obtained tax refund checks. Denis directed the proceeds of this fraud for his own personal benefit by wiring funds to his wife's account, to his landlord for rent, and to others for cash payments.

According to the complaint, in June 2015, Denis discussed cashing fraudulently obtained tax refund checks, in exchange for a 30% facilitator's fee. Denis directed co-conspirator Dumond to cash the fraudulently obtained checks with using false identification documents. Dumond cashed approximately \$120,000 in fraudulently obtained tax refund checks.

Denis was charged with conspiracy to commit theft of government money, theft of government money, and money laundering. Dumond was charged with conspiracy to commit theft of government money.

Mr. Ferrer commended the investigative efforts of IRS-CI, ICE-HSI, FBI, USSS, Coral Gables Police Department, and Golden Beach Police Department. This case is being prosecuted by Assistant U.S. Attorney Michael N. Berger.

**E. EFIN/TAX PREPARATION BUSINESS FRAUD**

17. **United States v. Johny Wolf Jasmin and Carneisha Patrice Mitchell**, Case No. 15-60276-CR-Zloch

**Johny Wolf Jasmin**, 32, of Boca Raton, and **Carneisha Patrice Mitchell**, 31, of Miami, were charged in a ten-count indictment for their participation in a stolen identity tax refund fraud scheme.

According to the allegations contained in the indictment, from on or about September 5, 2013, to March 4, 2015, in Hollywood, Florida, the defendants used various Electronic Filing Identification Numbers ("EFIN's"), to file false and fraudulent

federal income tax returns with the Internal Revenue Service (“IRS”) seeking refunds using stolen personal identifying information (“PII”) that was issued to living and deceased individuals. After the fraudulent tax returns were received by the IRS, the defendants arranged to have the tax refund payments loaded to various pre-paid debit cards in the names of taxpayers whose names and Social Security numbers were used to file false and fraudulent tax returns or issued by check in the names of taxpayers whose names and Social Security numbers were used to file false and fraudulent tax returns. In total, approximately \$1.4 million in fraudulent tax refunds were sought from the IRS.

Mr. Ferrer commended the investigative efforts of IRS-CI, FBI and ICE-HSI. This case is being prosecuted by Assistant U.S. Attorney Maurice A. Johnson.

18. **United States v. Shontavia Monique Williams**, Case No. 15-20878-CR-Altonaga

On November 13, 2015, **Shontavia Monique Williams**, 32, of Miami, was charged by indictment with participating in a fraudulent income tax refund scheme.

According to the allegations contained in the indictment, A-Z Tax Solutions, Inc. (“A-Z Tax”) was a business in Opa-Locka, Florida. Williams was the registered agent and owner of A-Z Tax, a tax preparation business. Williams maintained a bank account, in the name of A-Z Tax. The IRS permitted tax professionals to submit tax returns in the names of other individuals, in accordance with the rules and requirements of the IRS’s e-file program.

From January 17, 2012, through February 13, 2012, Williams filed income tax returns claiming tax refunds in the names of other people, knowing such claims were false, fictitious, and fraudulent. Williams used, without authorization, the Social Security numbers belonging to other individuals, to file the fraudulent claims. The claims totaled approximately \$41,504.00. From February 1, 2012 through February 8, 2012, Williams received a total of approximately \$33,858 in fraudulent tax refunds via U.S. Treasury electronic funds transfers issued to various payees.

Williams is charged with six counts of filing false, fictitious, and fraudulent individual income tax returns; five counts of theft of government property; and five counts of aggravated identity theft.

Mr. Ferrer commended the investigative efforts of IRS-CI, City of Miami Police Department and NMBPD. The case is being prosecuted by Assistant U.S. Attorney Ilham A. Hosseini.

19. **United States v. Wolf Obin, Stanley Muscova, and Rosny Muller**, Case No. 15-20885-CR-Gayles

On November 13, 2015, **Wolf Obin**, 32, of Miami-Dade, **Stanley Muscova**, 28, of **Miami-Dade**, and **Rosny Muller**, 29, of Broward County, were charged in an eight-count indictment for their participation in a conspiracy to commit tax fraud using other peoples' stolen identities.

According to the allegations contained in the indictment, beginning in or around October 2011, Obin, Muscova, and Muller fraudulently obtained Electronic Filing Identification Numbers ("EFINs") in the names of other individuals who acted as "straw" EFIN holders which allowed the defendants to submit tax returns in the names of other individuals. The defendants then used those EFINs, as well as EFINs in their own names, to file false and fraudulent federal income tax returns using the stolen personal identifying information of other individuals without their knowledge and authority. When law enforcement executed a search warrant on the defendants' Aventura apartment, they discovered the personal identifying information of more than 1,600 individuals. Through their tax filings, the defendants claimed approximately \$2,900,000 and caused the IRS to pay approximately \$1,700,000 in illicit federal tax refunds.

Mr. Ferrer commended the investigative efforts of the IRS-CI and Aventura Police Department. The case is being prosecuted by Assistant U.S. Attorney Matthew Langley.

20. **United States v. David Robersant Louis**, Case No. 15-6495-MJ-Valle

On November 17, 2015, **David Robersant Louis**, 36, of Miami, was charged by criminal complaint with possession of 15 or more unauthorized access devices, that is, Social Security numbers issued to other persons.

According to the allegations contained in the criminal complaint, Louis possessed in his computers the personal identifying information (PII) of hundreds of individuals, including their Social Security numbers, dates of birth, and names. This PII was used to file fraudulent tax returns from an IP address linked to Louis, in Miramar, Florida.

Mr. Ferrer commends the efforts of ICE-HSI and IRS-CI. This case is being prosecuted by Assistant U.S. Attorney Jonathan K. Osborne.

**F. STOLEN TREASURY CHECKS**

21. **United States v. Fidel Rodriguez**, Case No. 15-20743-CR-Martinez

On September 24, 2015, **Fidel Rodriguez**, 56, of Miami, was charged in a one-count information for his involvement in a stolen identity refund fraud scheme and account takeover scheme involving the cashing of fraudulently obtained checks.

According to documents filed in Court, Rodriguez was allegedly part of a conspiracy involving the filing of at least \$14 million in fraudulent large-dollar tax refund claims—each ranging from approximately \$140,000 to \$170,000—in 2014. These fraudulent refund requests were submitted for payment using stolen identity information. Over 100 of these tax refunds were directed for payment to the same address in Hialeah. The defendant is on surveillance video from a local bank depositing two fraudulently obtained tax refund checks—each totaling approximately \$160,000—that had been in September and October 2014. Separately, Rodriguez also deposited fraudulently obtained temporary bank checks—one for approximately \$195,000 and one for approximately \$400,000—using compromised bank account information at a local bank in Miami in December 2014 and January 2015.

Rodriguez was charged with one count of conspiracy to commit theft of government money.

Mr. Ferrer commended the investigative efforts of the Identity Theft Tax Refund Strike Force, with special commendation to IRS-CI, FBI, and ICE-HSI. This case is being prosecuted by Assistant U.S. Attorney Michael N. Berger.

22. **United States v. Shirley Saint-Louis**, Case No. 15-3498-MJ-Simonton

On November 17, 2015, **Shirley Saint-Louis**, 20, of North Miami, was charged by criminal complaint for her theft of government money.

According to the allegations contained in the criminal complaint, in December 2014, Saint-Louis deposited into her own bank accounts Department of Treasury checks for Social Security benefits and tax refunds that belonged to other individuals and which had been altered so that Saint-Louis' name and address appeared on the check instead of the intended beneficiaries' name and address.

Mr. Ferrer commended the investigative efforts of the SSA-OIG. The case is being prosecuted by Assistant U.S. Attorney Timothy J. Abraham.

23. **United States v. Anthony Maycock and Roshea Alexis Reid**, Case No. 15-20852-CR-Moore

On November 3, 2015, **Anthony Maycock**, 57, and **Roshea Alexis Reid**, 21, both of Miami, were charged in a two-count indictment with conspiracy to commit an offense against the United States and theft of government money.

According to the allegations contained in the indictment, Maycock, Reid, and their co-conspirators obtained and altered a United States Treasury check in the amount of \$31,401 and deposited it into a bank account controlled by them.

Mr. Ferrer commended the investigative efforts of TIGTA. The case is being prosecuted by Assistant U.S. Attorney Daya Nathan.

24. **United States v. Shonteaka Moore**, Case No. 15-20880-CR-Lenard

On November 13, 2015, **Shonteaka Moore**, 31, of Miami Gardens, was charged in a four-count indictment with theft of government money and aggravated identity theft.

According to the allegations contained in the indictment, Moore knowingly received, concealed, and retained at least two United States Department of Treasury checks with an aggregate value of more than \$1,000. Moore intended to convert these checks for her own personal use and gain, despite knowing they had been stolen. Specifically, on April 26, 2014, Moore deposited a United States Department of Treasury tax refund check issued in the amount of \$1,441 into a SunTrust bank account that she controlled. Then, on May 20, 2014, she deposited another United States Department of Treasury tax refund check issued in the amount of \$10,000 into the same bank account. Both times, Moore knowingly transferred the money to herself, without lawful authority, by using the names and signatures of the victims.

Mr. Ferrer commended the investigative efforts of the Aventura Police Department and IRS-CI. This case is being prosecuted by Assistant U.S. Attorney Anne McNamara.

25. **United States v. Jean Daniel Julien**, Case No. 15-8610-CR-Brannon

On November 17, 2015, **Jean Daniel Julien**, was charged by criminal complaint for his participation in a stolen identity tax fraud scheme which occurred in Palm Beach and Broward Counties.

According to the allegations contained in the criminal complaint, Julien received a \$56,000 U.S. Treasury refund check in the name of "D.H." Another individual opened a bank account in D.H.'s name, and the defendant deposited the refund check into this account. Julien then deposited a \$55,000 starter check written on the D.H. account into a business account controlled by Julien's wife. During the next three days, most of the \$55,000 was withdrawn from the account.

The complaint charges the defendant with theft of government money and bank fraud.

Mr. Ferrer commended the investigative efforts of IRS-CI. The case is being prosecuted by Assistant U.S. Attorney William Zloch.

26. **United States v. Lori Sue Lotter**, Case No. 15-20848-CR-Moreno

On October 30, 2015, **Lori Sue Lotter**, 41, of Miami, was charged by indictment with theft of a United States Department of Treasury tax refund check.

According to the allegations contained in the indictment, on May 19, 2014, Lotter deposited into her own bank account a Department of Treasury tax refund check that belonged to another individual and which had been altered so that Lotter's name and address appeared on the check instead of the intended beneficiaries' name and address.

Mr. Ferrer commended the investigative efforts of the USSS. The case is being prosecuted by Assistant U.S. Attorney Matthew Langley.

27. **United States v. Johanne Hilaire**, Case No.15-20873-CR-Seitz

On November 10, 2015, **Johanne Hilaire**, 30, of Miami, was charged by indictment with four counts of theft of government money. According to the allegations contained in the indictment, Hilaire retained for her own use and gain over \$10,000 of stolen United States Treasury checks.

Mr. Ferrer commended the investigative efforts of TIGTA. The case is being prosecuted by Assistant U.S. Attorney Daya Nathan.

28. **United States v. Darius Terrell Parke**, Case No.15-60279-CR-Cohn

On November 10, 2015, **Darius Terrell Parke**, 19, of Miami, was charged by indictment with fraudulent endorsement of a United States Treasury check, theft of government money, and aggravated identity theft. According to the allegations contained in the indictment, Parke fraudulently endorsed and cashed a United States Treasury check that belonged to another individual.

Mr. Ferrer commended the investigative efforts of IRS-CI, TIGTA and the Fort Lauderdale Police Department. The case is being prosecuted by Assistant U.S. Attorney Daya Nathan.

29. **United States v. Tewon Ieshia Thompson**, Case No.15-60280-CR-Zloch

On November 10, 2015, **Tewon Ieshia Thompson**, 22, of Fort Lauderdale, was charged by indictment with fraudulent endorsement of a United States Treasury check, theft of government money, and aggravated identity theft. According to the allegations contained in the indictment, Thompson fraudulently endorsed and cashed a United States Treasury check that belonged to another individual.

Mr. Ferrer commended the investigative efforts of the IRS-CI, TIGTA and the Fort Lauderdale Police Department. The case is being prosecuted by Assistant U.S. Attorney Daya Nathan.

30. **United States v. Bertram Marvin White**, Case No.15-60292-CR-Marra

On November 17, 2015, **Bertram Marvin White**, 30, of Miami, was charged by indictment with fraudulent endorsement of a United States Treasury check, theft of government money, and aggravated identity theft. According to the allegations contained in the indictment, White fraudulently endorsed and cashed a United States Treasury check that belonged to another individual.

Mr. Ferrer commended the investigative efforts of IRS-CI, TIGTA and the Miramar Police Department. The case is being prosecuted by Assistant U.S. Attorney Daya Nathan.

**G. STOLEN IDENTITY BENEFITS/CREDIT CARD FRAUD**

31. **United States v. Alexandra Fernandez**, Case No. 15-20881-CR-King

On November 13, 2015, **Alexandra Fernandez**, 25, of Miami, was charged in a three-count indictment with one count of unlawful use of one or more access devices, and two counts of aggravated identity theft.

According to the allegations contained in the indictment, from approximately July 13, 2015, through July 23, 2015, Fernandez knowingly used credit card numbers belonging to another person in order to fraudulently obtain more than \$1,000 worth of items. In doing so, on at least two occasions, Fernandez purposely transferred, possessed, and used, without lawful authority, the victim's means of identification to obtain merchandise.

Mr. Ferrer commended the investigative efforts of the Aventura Police Department and ICE-HSI. The case is being prosecuted by Assistant U.S. Attorney Anne P. McNamara.

32. **United States v. Bechir Delva and Dann Kenny Delva**, Case No. 15-60209-CR-Dimitrouleas

**Bechir Delva**, 24, and **Dan Kenny Delva**, 27, both of Miramar, were charged in a seven-count indictment for their participation in an identity theft scheme.

According to the allegations contained in the indictment, the defendants conspired to possess debit cards and Social Security numbers issued to other persons and possessed several firearms, including an AR-15 rifle, a SIG 522 rifle and a .380 pistol, to protect the stolen items. The indictment charges the defendants with one count of conspiracy to possess fifteen or more unauthorized access devices, one count of possession of fifteen or more unauthorized access devices, and five counts of aggravated identity theft.

Mr. Ferrer commended the investigative efforts of IRS-CI and ICE-HSI. The case is being prosecuted by Assistant U.S. Attorney John R. Byrne.

33. **United States v. Ricardo Jean Loiseau**, Case No. 15-60208-CR-Cohn

**Ricardo Jean Loiseau**, 27, of Hallandale Beach, was charged in a four-count indictment for his participation in an identity theft scheme.

According to the allegations contained in the indictment, the defendant possessed debit cards registered to other individuals. The indictment charges the defendant with one count of possession of fifteen or more unauthorized access devices and three counts of aggravated identity theft.

Mr. Ferrer commended the investigative efforts of IRS-CI and ICE-HSI. The case is being prosecuted by Assistant U.S. Attorney John R. Byrne.

34. **United States v. Stacy A. Gaines and Nicaya T. Cooper**, Case No. 15-60275-CR-Dimitrouleas

On November 5, 2015, **Stacy A. Gaines**, 39, and **Nicaya T. Cooper**, 35 both of Tamarac, were charged by criminal information for their participation in a stolen identity tax fraud scheme.

According to the information, from February 2010, through July 2013, Gaines and Cooper filed, or caused to be filed, fraudulent federal tax returns with the Internal Revenue Service ("IRS") seeking refunds in the amount of \$299,433.88. The IRS refunded approximately \$279,866.39 for those fraudulently filed tax returns.

According to the investigation, Cooper opened bank accounts at Regions Bank and gave Gaines access to those accounts to deposit the various fraudulent refunds. Gaines filled out the fraudulent tax returns seeking refunds by hand utilizing the personal identification information ("PII") from various individuals and mailed them into the IRS for processing. The true taxpayers did not give Gaines or Cooper permission to file fraudulent returns on their behalf.

The defendants are charged with participating in a wire fraud conspiracy.

Mr. Ferrer commended the investigative efforts of IRS-CI, BSO and the USSS South Florida Organized Fraud Task Force (SFOTF). The case is being prosecuted by Assistant U.S. Attorney Alicia E. Shick.

### 35. **United States v. Damian Williams**, Case No. 15-20856-CR-Moreno

On November 3, 2015, **Daiman Williams**, 23, of North Miami Beach, was charged in a four-count indictment for his participation in a stolen identity tax fraud scheme.

According to the allegations contained in the indictment, on or about January 18, 2013, a state probation compliance check was performed on Williams at his residence in North Miami Beach, FL. During the compliance check of Williams' residence, officers found a Toshiba laptop that contained a list of personal identifying information (PII). A forensic examination of the laptop revealed a series of documents containing over two thousand (2,000) pieces of PII, which included the names, Social Security numbers, and dates of birth for hundreds of school teachers and medical patients. In addition, credit reports, tax returns, and other miscellaneous PII were found in the laptop. Further investigation revealed that several of the individuals identified from the laptop had been victims of identity theft related to the fraudulent filing of their federal income tax returns.

On or about August 26, 2014, another state probation compliance check was performed on Williams' residence. In connection with the compliance check, law enforcement searched Williams' phone and found a video of the defendant holding a firearm and then storing the firearm in the trunk of a white Lexus vehicle. The vehicle was found in the driveway of Williams' residence. Officers opened the trunk of the vehicle and discovered the firearm, ammunition and PII for more than 50 individuals, including names, dates of birth and Social Security numbers of homeowners' insurance applications and completed income tax forms.

The indictment charges the defendant with possession of fifteen or more unauthorized access devices and aggravated identity theft.

Mr. Ferrer commended the investigative efforts of IRS-CI, DOL-OIG, DEO, and the NMBPD. The case is being prosecuted by Assistant U.S. Attorney Miesha Shonta Darrough.

36. **United States v. Edward Fiol**, Case No. 15-20827-CR-Graham

On October 23, 2015, **Edward Fiol**, 59, of Miami, was charged in a ten count indictment for his participation in a scheme to embezzle money from the Social Security Administration.

According to the allegations contained in the indictment, from January 2011 through December 2013, Fiol embezzled money payable to an individual with the initials "M.F." and improperly converted the money to his own use.

Mr. Ferrer commended the investigative efforts of the SSA-OIG. The case is being prosecuted by Assistant United States Attorney Cary O. Aronovitz.

37. **United States v. Quinzella Jjovanna Romer**, Case No. 15-06498-MJ-Valle

On November 18, 2015, **Quinzella J. Romer**, 39, of Miami, was charged by criminal complaint for her participation in possessing over 60 persons names and Social Security numbers that she unlawfully accessed while working at a health insurance company.

According to the allegations contained in the criminal complaint, on April 8, 2014, Romer was issued a traffic citation and law enforcement determined that she had an outstanding warrant for arrest due to petit theft. A pat down was conducted of Romer's person and law enforcement found a Florida driver's license in another person's name in her jacket. After obtaining a search warrant, law enforcement searched Romer's cell phone where they found over 20 pictures of a computer screen containing personal identifying information (PII), names and Social Security numbers of health insurance customers. Upon further investigation, law enforcement determined that at least three of the individuals whose PII was found in Romer's phone were victims of identity theft in 2013.

The criminal complaint charges Romer with knowingly, and with intent to defraud, possessing fifteen or more unauthorized access devices, that is names and Social Security numbers issued to other persons, and aggravated identity theft.

Mr. Ferrer commended the investigative efforts of IRS-CI and the Coral Springs Police Department. The case is being prosecuted by Assistant U.S. Attorney Cary O. Aronovitz.

38. **United States v. Wilna Joseph and Maraldy Necker Jean**, Case No. 15-60277-CR-Zloch

On November 6, 2015, **Wilna Joseph**, 36, and **Maraldy Necker Jean**, 39, both of Broward County, were indicted for their involvement in an identity theft conspiracy scheme involving the trafficking in, use, and possession of unauthorized debit card account numbers.

According to the allegations contained in the indictment, between January 20 and 21, 2014, a conspirator filed fraudulent tax returns using the name and Social Security number of other individuals. Then, on February 6, 2014, the defendants drove to a Wells Fargo Bank in Pembroke Pines and Joseph attempted to withdraw cash from the ATM using a debit card encoded with an account number belonging to one of the tax return victims. The defendants then drove to a Citibank, located in Pembroke Pines, where Joseph made four withdrawals, totaling approximately \$1,200.00, using a debit card encoded with an account number belonging to another one of the tax return victims.

At the time of their arrest, on February 6, 2014, the defendants had in their possession seventeen unauthorized debit cards, registered in the names of other persons.

The defendants are charged with access device fraud and aggravated identity theft.

Mr. Ferrer commends the efforts of IRS-CI, FBI, and the Pembroke Pines Police Department. This case is being prosecuted by Assistant U.S. Attorney Jonathan K. Osborne.

39. **United States v. Reyniel Cabrera Inurrieta, a/k/a “Anthony Smith,” a/k/a “Anthuan Smith,”** Case No. 15-CR-20819-Cooke

On November 6, 2015, **Reyniel Cabrera Inurrieta**, 29, of Miami, was indicted for importing and attempting to possess with the intent to distribute a controlled substance, ethylone (“Molly”), into the United States from China.

According to the allegations contained in the previously filed criminal complaint, on October 21, 2015, Inurrieta attempted to pick up two parcels that had arrived at his P.O. Box in Miami, from China which he expected contained ethylone. At the time of his arrest, Inurrieta also possessed numerous counterfeit credit cards.

Mr. Ferrer commends the efforts of ICE-HSI, USSS, and MDPD. This case is being prosecuted by Assistant U.S. Attorney Jonathan K. Osborne.

40. **United States v. Marvin John Janvier**, Case No. 15-20851-CR-Gayles

On November 3, 2015, **Marvin John Janvier**, 22, of Miami, was charged in a nine-count indictment for his participation in an identity theft tax fraud scheme.

According to the allegations contained in the indictment, between January 21, 2015 and April 25, 2015, Janvier caused to be filed over 170 fraudulent federal income tax returns, seeking refunds in excess of \$100,000.

Janvier was charged with wire fraud, aggravated identity theft, and possession of fifteen or more unauthorized access devices.

Mr. Ferrer commended the investigative efforts of IRS-CI, USSS, and NMBPD. The case is being prosecuted by Assistant U.S. Attorney Daya Nathan.

41. **United States v. Mike Patrick Guillaume**, Case No.15-60288-CR-Bloom

On November 10, 2015, **Mike Patrick Guillaume**, 31, of Miramar, was charged by indictment for his participation in an identity theft scheme.

According to the allegations contained in the indictment, on or about December 4, 2014, the defendant possessed the Social Security numbers of at least fifteen individuals. The indictment also alleges that the defendant transferred, possessed and used the means of identification, specifically, the debit card account numbers of two individuals.

The indictment charges the defendant with use of unauthorized access devices, possession of fifteen or more unauthorized access devices, and aggravated identity theft.

Mr. Ferrer commended the investigative efforts of the Miramar Police Department and ICE-HSI. The case is being prosecuted by Assistant U.S. Attorney Daya Nathan.

42. **United States v. Ronel Junior Lamour**, Case No.15-20882-CR-Gayles

On November 13, 2015, **Ronel Junior Lamour**, 25, of Miami, was charged in a 5-count indictment for a scheme to use stolen identities to file unauthorized tax returns, setup bank accounts with debit cards in the names of the tax filers, and then have the refunds wired to those accounts.

According to the allegations contained in the indictment, beginning on or about February 1, 2013, Lamour fraudulently used debit card account numbers issued to other persons to purchase United States Postal Service (USPS) money orders. On August 13, 2014 and January 2, 2014, Lamour deposited these USPS money orders into a bank account.

On March 18, 2014, pursuant to a warrant, federal law enforcement conducted an electronic search of Lamour's cell phone. The search uncovered personal identifying information ("PII") - including names, dates of birth, and social security numbers.

The investigation further revealed that Lamour used Social Security numbers issued to other persons to file unauthorized tax returns.

Lamour was charged with conspiracy to commit access device fraud, use of one or more unauthorized access devices, possession of fifteen or more unauthorized access devices and aggravated identity theft.

Mr. Ferrer commended the investigative efforts of the IRS-CI and USPIIS. The case is being prosecuted by Assistant U.S. Joshua S. Rothstein.

43. **United States v. Sean Lyons**, Case No. 15-60297-CR-Cohn

On November 17, 2015, **Sean Lyons**, 29, of Plantation, was charged in a five-count indictment for his participation in a stolen identity tax fraud scheme.

According to the allegations contained in the indictment, on May 28, 2014, Lyons possessed unauthorized prepaid debit cards registered to at least fifteen people. The indictment also alleges that Lyons transferred, possessed, or used the means of identification of four individuals in relation to that offense.

The indictment charges Lyons with possession of fifteen or more unauthorized access devices and aggravated identity theft.

Mr. Ferrer commended the investigative efforts of the IRS-CI and the Plantation Police Department. The case is being prosecuted by Assistant U.S. Attorney Tonya R. Long.

If convicted of the charged conduct, the defendants face a possible maximum statutory sentence of 10 years in prison for possession of fifteen or more unauthorized access devices; 10 years in prison for trafficking in or using one or more unauthorized access devices during a one-year period and by such conduct obtaining anything of value over \$1,000; 5 years in prison for theft of mail; 10 years in prison for theft of government money; 5 in prison for conspiracy to commit theft of government money; 5 years in prison for conspiracy to defraud the United States; 20 years in prison for participating in a wire fraud conspiracy; 5 years in prison for conspiracy to pass Treasury checks bearing forged endorsements; and 2 years in prison consecutive to any other term for aggravated identity theft.

A complaint or an indictment is only an accusation and a defendant is presumed innocent unless and until proven guilty.

A copy of this press release may be found on the website of the United States Attorney's Office for the Southern District of Florida at [www.usdoj.gov/usao/fls](http://www.usdoj.gov/usao/fls). Related court documents and information may be found on the website of the District Court for the Southern District of Florida at [www.flsd.uscourts.gov](http://www.flsd.uscourts.gov) or on <http://pacer.flsd.uscourts.gov>.